

2012R484
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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2013 JAN 29 P 11:03
IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

Northern Division

UNITED STATES OF AMERICA

v.

AMEFIKA GRAY and

NETWORK AUTO GROUP, INC.

Defendants

)) Criminal No. ELH-13-CR-039
))
) Counts 1; 5-12: 31 U.S.C. § 5324(a)(3)
) (structuring currency deposits)
)
) Counts 2-4: 31 U.S.C. § 5324(a)(1)
) (attempting to cause a financial institution to
) fail to file currency transaction reports)
)
) Forfeiture: 31 U.S.C. § 5317(c)

INDICTMENT

COUNT ONE

(Structuring Currency Deposits)

THE GRAND JURY FOR THE DISTRICT OF MARYLAND CHARGES THAT:

At the times pertinent to this Indictment --

1. AMEFIKA GRAY is the sole owner of NETWORK AUTO GROUP, INC. which operates an auto dealership at 2631 Gwynns Falls Parkway, Baltimore, Maryland 21216.
2. NETWORK AUTO GROUP, INC. and AMEFIKA GRAY maintained a bank account (Account No. *****3801) titled "Network Auto Group, Inc. dba Amefika Gray" at Bank of America.
3. AMEFIKA GRAY maintained a bank account (Account No. *****7645) at M&T Bank.
4. Title 31, United States Code, Section 5313, and 31 C.F.R. §§ 103.22(b)(1) and 103.27(a) (recodified as 31 C.F.R. §§ 1010.311 and 1010.306(a) as of March 1, 2011) required that a financial

institution that engages in a currency transaction involving more than \$10,000 in U.S. Currency must file a report of the transaction with the Internal Revenue Service.

5. 31 C.F.R. § 103.22(c)(2) (recodified as 31 C.F.R. § 1010.313(b)) provided that multiple transactions at the same financial institution on the same day must be treated as a single transaction. Deposits made on a weekend or holiday are treated as if received on the next business day.

6. 31 U.S.C. § 5324(a)(3) and 31 C.F.R. § 1010.314(c) made it an offense to structure or assist in structuring, or attempt to structure or assist in structuring, any transaction with one or more domestic financial institutions.

7. 31 U.S.C. § 5324(a)(1) and 31 C.F.R. § 1010.314(a) made it an offense to cause or attempt to cause a domestic financial institution to fail to file a report required under 31 U.S.C. § 5313.

8. 31 C.F.R. § 103.11(gg) (recodified as 31 C.F.R. § 1010.100(xx)) defined "structuring" to include conducting one or more transactions in currency, in any amount, at one or more financial institutions, on one or more days, in any manner, for the purpose of evading the reporting requirements under § 103.22 (§ 1010.311). The regulation applied to a person "acting alone, or in conjunction with or on behalf of other persons," and defined "in any manner" to include the breaking down of a single sum of currency exceeding \$10,000 into smaller sums, as well as conducting a series of currency transactions, including transactions "at or below \$10,000." Finally, the regulation provided that "The transaction or transactions need not exceed the \$10,000 reporting threshold at any single financial institution on any single day in order to constitute structuring."

9. On the dates set forth in Schedule A, which is incorporated herein, AMEFIKA GRAY deposited, or caused a third party to deposit, U.S. currency into Account No. *****3801 at Bank of America and Account No. *****7645 at M&T Bank in the amounts set forth in the Schedule.

The Charge

10. Beginning at least as early as January 15, 2010 and continuing at least until April 28, 2012, in the District of Maryland, the defendants

AMEFIKA GRAY AND

NETWORK AUTO GROUP, INC.

knowingly structured currency transactions with one or more domestic financial institutions for the purpose of evading the reporting requirements of section 5313 of Title 31, United States Code, and the regulations promulgated thereunder, and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

Schedule A

SCHEDULE OF CASH DEPOSITS BANK OF AMERICA (BOA) ACCOUNT NO. *****3801 M&T BANK (M&T) ACCOUNT NO. *****7645					
DEPOSIT DATE	BANK	ACCOUNT NO.	BRANCH	TIME	CASH DEPOSIT
Friday, January 15, 2010	BOA	*****3801			3,000.00
Wednesday, January 20, 2010	BOA	*****3801			8,000.00
Friday, January 29, 2010	BOA	*****3801			9,500.00
Saturday, January 30, 2010	BOA	*****3801			9,500.00
Monday, February 01, 2010	M&T	*****7645			380.00
Wednesday, February 03, 2010	BOA	*****3801			8,000.00
Thursday, February 04, 2010	BOA	*****3801			2,900.00
Tuesday, February 09, 2010	M&T	*****7645			500.00
Thursday, February 18, 2010	BOA	*****3801			3,500.00
Friday, February 19, 2010	BOA	*****3801			9,000.00
Monday, February 22, 2010	M&T	*****7645			4,000.00
Tuesday, February 23, 2010	BOA	*****3801			6,000.00
Monday, March 01, 2010	BOA	*****3801			1,000.00
Thursday, March 04, 2010	BOA	*****3801			1,000.00
Monday, March 08, 2010	BOA	*****3801			9,000.00
Wednesday, March 10, 2010	BOA	*****3801			8,000.00
Friday, March 19, 2010	BOA	*****3801			3,500.00

Saturday, March 20, 2010	BOA	*****3801			6,000.00
Saturday, March 27, 2010	BOA	*****3801			9,000.00
Monday, March 29, 2010	BOA	*****3801			9,000.00
Wednesday, March 31, 2010	BOA	*****3801			5,000.00
Friday, April 02, 2010	BOA	*****3801			9,000.00
Monday, April 05, 2010	BOA	*****3801			9,000.00
Tuesday, April 06, 2010	BOA	*****3801			9,000.00
Wednesday, April 07, 2010	BOA	*****3801			9,000.00
Wednesday, April 21, 2010	BOA	*****3801			400.00
Thursday, April 22, 2010	BOA	*****3801			7,000.00
Friday, April 23, 2010	BOA	*****3801			445.00
Tuesday, May 04, 2010	BOA	*****3801			3,000.00
Friday, May 07, 2010	BOA	*****3801			9,000.00
Monday, May 10, 2010	BOA	*****3801	9:49 AM	Belvedere Alameda	9,000.00
Monday, May 10, 2010	M&T	*****7645		Mondawmin SFW	5,000.00
Monday, May 17, 2010	BOA	*****3801			9,000.00
Wednesday, May 19, 2010	BOA	*****3801			3,000.00
Thursday, May 20, 2010	BOA	*****3801			3,200.00
Saturday, May 22, 2010	BOA	*****3801			4,000.00
Monday, May 24, 2010	BOA	*****3801	10:23 AM	Belvedere Alameda	9,500.00
Monday, May 24, 2010	M&T	*****7645		Goucher Blvd SFW	9,000.00
Friday, May 28, 2010	BOA	*****3801			5,000.00
Saturday, May 29, 2010	BOA	*****3801			9,000.00
Tuesday, June 01, 2010	BOA	*****3801			6,000.00
Thursday, June 03, 2010	BOA	*****3801			9,500.00
Wednesday, June 09, 2010	BOA	*****3801			4,000.00
Monday, June 14, 2010	BOA	*****3801			9,500.00
Tuesday, June 15, 2010	BOA	*****3801			9,500.00
Wednesday, June 16, 2010	BOA	*****3801			9,500.00
Thursday, June 17, 2010	BOA	*****3801	9:22 AM	Mondawmin	9,500.00
Thursday, June 17, 2010	M&T	*****7645		Mondawmin SFW	9,500.00
Thursday, June 17, 2010	M&T	*****7645		Mondawmin SFW	9,500.00
Wednesday, June 30, 2010	BOA	*****3801			9,800.00
Thursday, July 01, 2010	BOA	*****3801			8,000.00
Saturday, July 03, 2010	BOA	*****3801			9,000.00
Tuesday, July 06, 2010	M&T	*****7645			9,000.00
Saturday, July 10, 2010	BOA	*****3801			9,500.00
Saturday, July 17, 2010	BOA	*****3801			9,500.00
Monday, July 19, 2010	M&T	*****7645			3,500.00
Wednesday, July 21, 2010	BOA	*****3801			9,500.00
Thursday, July 22, 2010	BOA	*****3801	9:55 AM	Fruitville Pike	9,500.00

Thursday, July 22, 2010	M&T	*****7645		Mondawmin SFW	3,000.00
Saturday, July 24, 2010	BOA	*****3801			9,500.00
Monday, July 26, 2010	M&T	*****7645			7,000.00
Thursday, July 29, 2010	BOA	*****3801	10:50 AM	Tollgate Road	9,500.00
Thursday, July 29, 2010	BOA	*****3801	1:36 PM	Constant Friendship	8,100.30
Friday, July 30, 2010	BOA	*****3801	5:50 PM	Mondawmin	9,500.00
Friday, July 30, 2010	M&T	*****7645		Mondawmin SFW	8,500.00
Wednesday, August 04, 2010	BOA	*****3801			9,500.00
Saturday, August 07, 2010	BOA	*****3801			4,000.00
Tuesday, August 17, 2010	BOA	*****3801			9,500.00
Tuesday, August 24, 2010	BOA	*****3801			6,720.00
Saturday, August 28, 2010	BOA	*****3801			5,000.00
Friday, September 03, 2010	BOA	*****3801			7,000.00
Thursday, September 09, 2010	M&T	*****7645			4,200.00
Saturday, September 11, 2010	BOA	*****3801			8,500.00
Saturday, September 25, 2010	BOA	*****3801			9,800.00
Monday, September 27, 2010	BOA	*****3801			9,800.00
Wednesday, September 29, 2010	BOA	*****3801			3,300.00
Thursday, September 30, 2010	BOA	*****3801			9,500.00
Monday, October 04, 2010	BOA	*****3801			5,000.00
Wednesday, October 06, 2010	M&T	*****7645			2,500.00
Friday, October 08, 2010	BOA	*****3801			9,000.00
Wednesday, October 13, 2010	BOA	*****3801	12:57 PM	Belvedere Alameda	9,500.00
Wednesday, October 13, 2010	M&T	*****7645		Goucher Blvd SFW	9,500.00
Friday, October 15, 2010	BOA	*****3801			4,000.00
Saturday, October 16, 2010	BOA	*****3801			9,500.00
Wednesday, October 20, 2010	BOA	*****3801			6,500.00
Thursday, October 21, 2010	BOA	*****3801			9,700.00
Monday, October 25, 2010	BOA	*****3801			7,000.00
Monday, November 01, 2010	M&T	*****7645			7,000.00
Tuesday, November 09, 2010	BOA	*****3801			6,450.00
Saturday, November 13, 2010	BOA	*****3801			5,000.00
Monday, November 15, 2010	BOA	*****3801			8,000.00
Saturday, November 20, 2010	BOA	*****3801			8,500.00
Wednesday, November 24, 2010	BOA	*****3801			8,000.00
Tuesday, November 30, 2010	BOA	*****3801			350.00
Thursday, December 02, 2010	BOA	*****3801			7,000.00
Saturday, December 04, 2010	BOA	*****3801			4,000.00
Friday, December 10, 2010	BOA	*****3801			9,000.00
Monday, December 13, 2010	M&T	*****7645			863.93
Friday, December 17, 2010	BOA	*****3801			9,000.00

Saturday, December 18, 2010	BOA	*****3801			9,500.00
Wednesday, December 22, 2010	BOA	*****3801			7,500.00
Thursday, December 23, 2010	BOA	*****3801			9,500.00
Tuesday, December 28, 2010	BOA	*****3801			370.00
Wednesday, December 29, 2010	M&T	*****7645			1,000.00
					326.00
Friday, December 31, 2010	BOA	*****3801			
Friday, December 31, 2010	BOA	*****3801			3,500.00
Thursday, January 06, 2011	BOA	*****3801			2,000.00
Thursday, January 06, 2011	BOA	*****3801			7,500.00
Friday, January 07, 2011	M&T	*****7645			2,500.00
Saturday, January 08, 2011	BOA	*****3801			9,000.00
Saturday, January 15, 2011	BOA	*****3801			7,000.00
Wednesday, January 19, 2011	BOA	*****3801			9,500.00
Friday, January 21, 2011	BOA	*****3801			9,500.00
Monday, January 24, 2011	M&T	*****7645			4,000.00
Tuesday, January 25, 2011	BOA	*****3801			6,400.00
Wednesday, February 02, 2011	BOA	*****3801			6,000.00
Tuesday, February 08, 2011	BOA	*****3801			9,000.00
Wednesday, February 09, 2011	BOA	*****3801			9,500.00
Friday, February 11, 2011	BOA	*****3801			6,000.00
Monday, February 14, 2011	BOA	*****3801			9,500.00
Tuesday, February 15, 2011	BOA	*****3801			7,500.00
Thursday, February 17, 2011	BOA	*****3801			7,000.00
Saturday, February 19, 2011	BOA	*****3801			8,000.00
Friday, February 25, 2011	BOA	*****3801			4,000.00
Saturday, February 26, 2011	BOA	*****3801			9,000.00
Monday, February 28, 2011	BOA	*****3801	9:32 AM	Belvedere Alameda	9,000.00
Monday, February 28, 2011	M&T	*****7645		Hillendale	8,000.00
Saturday, March 05, 2011	BOA	*****3801			9,500.00
Monday, March 07, 2011	BOA	*****3801			1,800.00
Tuesday, March 08, 2011	BOA	*****3801			8,000.00
Wednesday, March 09, 2011	BOA	*****3801			5,000.00
Saturday, March 12, 2011	BOA	*****3801			8,500.00
Monday, March 14, 2011	BOA	*****3801	11:54 AM	Belvedere Alameda	9,000.00
Monday, March 14, 2011	M&T	*****7645		Hillendale	8,000.00
Thursday, March 17, 2011	BOA	*****3801			9,500.00
Friday, March 18, 2011	M&T	*****7645			7,000.00
Monday, March 21, 2011	BOA	*****3801			8,500.00
Monday, March 21, 2011	M&T	*****7645			260.00
Friday, March 25, 2011	BOA	*****3801			6,000.00
Saturday, March 26, 2011	BOA	*****3801			5,000.00

Monday, March 28, 2011	M&T	*****7645			4,000.00
Saturday, April 02, 2011	BOA	*****3801			4,500.00
Wednesday, April 06, 2011	BOA	*****3801			9,000.00
Friday, April 08, 2011	BOA	*****3801			6,000.00
Friday, April 08, 2011	BOA	*****3801			3,000.00
Saturday, April 09, 2011	BOA	*****3801			9,000.00
Monday, April 11, 2011	BOA	*****3801	10:20 AM	Belvedere Alameda	9,000.00
Monday, April 11, 2011	M&T	*****7645		Roland Park	7,000.00
Tuesday, April 12, 2011	BOA	*****3801	3:01 PM	Gardenville	9,000.00
Tuesday, April 12, 2011	M&T	*****7645		Gardenville	5,500.00
Friday, April 15, 2011	BOA	*****3801			9,400.00
Saturday, April 16, 2011	BOA	*****3801			9,500.00
Thursday, April 21, 2011	BOA	*****3801			8,000.00
Friday, April 22, 2011	BOA	*****3801	11:23 AM	Fruitville Pike, PA	9,500.00
Friday, April 22, 2011	BOA	*****3801	5:56 PM	Mondawmin Mall	9,000.00
Friday, April 22, 2011	M&T	*****7645		Chelsea Square	8,000.00
Saturday, April 23, 2011	BOA	*****3801			9,500.00
Friday, April 29, 2011	BOA	*****3801	12:07 PM	Mondawmin Mall	4,000.00
Friday, April 29, 2011	BOA	*****3801	5:37 PM	Reisterstown Road	9,500.00
Saturday, April 30, 2011	BOA	*****3801			7,000.00
Wednesday, May 04, 2011	M&T	*****7645			2,140.00
Friday, May 06, 2011	BOA	*****3801	6:11 PM	North Charles	3,500.00
Friday, May 06, 2011	M&T	*****7645		Chelsea Square	9,500.00
Monday, May 09, 2011	BOA	*****3801			9,000.00
Wednesday, May 11, 2011	BOA	*****3801			9,500.00
Thursday, May 12, 2011	BOA	*****3801			20,000.00
Monday, May 16, 2011	BOA	*****3801			9,000.00
Saturday, May 21, 2011	BOA	*****3801			7,500.00
Monday, May 23, 2011	BOA	*****3801	5:01 PM	Mondawmin	9,500.00
Monday, May 23, 2011	M&T	*****7645		Goucher Blvd SFW	5,500.00
Thursday, May 26, 2011	BOA	*****3801			9,500.00
Monday, June 06, 2011	BOA	*****3801			520.00
Friday, June 10, 2011	BOA	*****3801			5,000.00
Saturday, June 18, 2011	BOA	*****3801			9,500.00
Thursday, June 23, 2011	BOA	*****3801			8,000.00
Friday, June 24, 2011	BOA	*****3801			9,000.00
Saturday, June 25, 2011	BOA	*****3801			30,000.00
Tuesday, June 28, 2011	M&T	*****7645			4,690.00
Wednesday, June 29, 2011	BOA	*****3801			7,000.00
Thursday, June 30, 2011	BOA	*****3801			4,500.00
Friday, July 01, 2011	M&T	*****7645			5,500.00
Saturday, July 02, 2011	BOA	*****3801			85,000.00

Tuesday, July 05, 2011	BOA	*****3801			2,500.00
Wednesday, July 06, 2011	BOA	*****3801			1,500.00
Friday, July 08, 2011	BOA	*****3801	9:49 AM	Loch Raven	9,500.00
Friday, July 08, 2011	M&T	*****7645		Hillendale	8,000.00
Monday, July 11, 2011	BOA	*****3801			6,800.00
Wednesday, July 13, 2011	BOA	*****3801			6,000.00
Tuesday, July 19, 2011	BOA	*****3801			1,000.00
Friday, July 22, 2011	M&T	*****7645			2,600.00
Monday, July 25, 2011	BOA	*****3801			1,000.00
Saturday, July 30, 2011	BOA	*****3801			6,950.00
Saturday, July 30, 2011	BOA	*****3801			50.00
Thursday, August 04, 2011	BOA	*****3801			5,000.00
Friday, August 05, 2011	BOA	*****3801			6,000.00
Monday, August 08, 2011	BOA	*****3801			600.00
Thursday, August 18, 2011	M&T	*****7645			400.00
Friday, August 19, 2011	BOA	*****3801			3,000.00
Thursday, September 01, 2011	M&T	*****7645			2,500.00
Wednesday, September 07, 2011	BOA	*****3801			9,000.00
Monday, September 12, 2011	BOA	*****3801			9,000.00
Wednesday, September 21, 2011	BOA	*****3801			9,000.00
Thursday, September 22, 2011	M&T	*****7645			5,000.00
Thursday, September 29, 2011	BOA	*****3801			9,500.00
Friday, September 30, 2011	BOA	*****3801			9,000.00
Saturday, October 01, 2011	BOA	*****3801			3,200.00
Saturday, October 01, 2011	BOA	*****3801			6,000.00
Monday, October 03, 2011	M&T	*****7645			5,000.00
Wednesday, October 05, 2011	BOA	*****3801			9,000.00
Tuesday, October 11, 2011	BOA	*****3801			7,500.00
Monday, October 24, 2011	BOA	*****3801	9:28 AM	North Charles	9,500.00
Monday, October 24, 2011	BOA	*****3801	9:49 AM	North Charles	5,500.00
Tuesday, October 25, 2011	M&T	*****7645			6,000.00
Tuesday, October 25, 2011	M&T	*****7645			202.00
Thursday, October 27, 2011	BOA	*****3801			9,000.00
Friday, October 28, 2011	BOA	*****3801			9,200.00
Saturday, November 05, 2011	BOA	*****3801			9,000.00
Monday, November 07, 2011	BOA	*****3801	2:28 PM	Mondawmin	7,840.00
Monday, November 07, 2011	M&T	*****7645		Manassas SFW	5,000.00
Wednesday, November 09, 2011	BOA	*****3801	10:36 AM	Loch Raven	9,000.00
Wednesday, November 09, 2011	M&T	*****7645		Roland Park	3,000.00
Saturday, November 12, 2011	BOA	*****3801			9,500.00
Friday, November 18, 2011	BOA	*****3801	11:10 AM	Loch Raven	9,500.00
Friday, November 18, 2011	M&T	*****7645		Hillendale	7,000.00

Monday, November 21, 2011	BOA	*****3801			7,000.00
Wednesday, November 23, 2011	BOA	*****3801			5,500.00
Monday, November 28, 2011	BOA	*****3801			9,000.00
Wednesday, November 30, 2011	BOA	*****3801			9,500.00
Friday, December 02, 2011	BOA	*****3801	11:28 AM	Perring Parkway	9,500.00
Friday, December 02, 2011	M&T	*****7645		Chelsea Square	8,700.00
Saturday, December 03, 2011	BOA	*****3801			9,000.00
Friday, December 09, 2011	BOA	*****3801			9,500.00
Friday, December 16, 2011	BOA	*****3801			3,000.00
Monday, December 19, 2011	M&T	*****7645			780.00
Wednesday, December 21, 2011	BOA	*****3801			3,600.00
Thursday, December 22, 2011	BOA	*****3801			9,500.00
Friday, December 23, 2011	BOA	*****3801	4:49 PM	North Charles	8,500.00
Friday, December 23, 2011	M&T	*****7645		Goucher Blvd SFW	8,200.00
Thursday, December 29, 2011	BOA	*****3801			<u>4,000.00</u>
Tuesday, January 03, 2012	M&T	*****7645			300.00
Tuesday, January 03, 2012	M&T	*****7645			5.00
Tuesday, January 03, 2012	M&T	*****7645			3,500.00
Wednesday, January 04, 2012	BOA	*****3801			4,000.00
Tuesday, January 10, 2012	M&T	*****7645			100.00
Thursday, January 12, 2012	BOA	*****3801			9,500.00
Friday, January 13, 2012	BOA	*****3801			17,650.00
Tuesday, January 17, 2012	BOA	*****3801			9,000.00
Wednesday, January 18, 2012	BOA	*****3801			5,500.00
Monday, January 23, 2012	BOA	*****3801			8,500.00
Wednesday, January 25, 2012	M&T	*****7645			2,000.00
Saturday, January 28, 2012	BOA	*****3801			3,000.00
Tuesday, January 31, 2012	BOA	*****3801			5,000.00
Friday, February 03, 2012	M&T	*****7645			3,000.00
Wednesday, February 08, 2012	BOA	*****3801			6,000.00
Monday, February 13, 2012	BOA	*****3801			9,800.00
Thursday, February 16, 2012	BOA	*****3801			1,500.00
Tuesday, February 21, 2012	BOA	*****3801	11:31 AM	North Charles	9,000.00
Tuesday, February 21, 2012	BOA	*****3801	11:42 AM	Belvedere-Alameda	8,000.00
Tuesday, February 21, 2012	M&T	*****7645		Roland Park	5,000.00
Wednesday, February 22, 2012	BOA	*****3801			8,500.00
Monday, February 27, 2012	BOA	*****3801	5:08 PM	North Charles	8,000.00
Monday, February 27, 2012	M&T	*****7645		Hillendale	3,000.00
Monday, March 05, 2012	BOA	*****3801			5,400.00
Tuesday, March 06, 2012	M&T	*****7645			5,000.00
Thursday, March 08, 2012	BOA	*****3801			9,400.00

Friday, March 09, 2012	BOA	*****3801			9,000.00
Saturday, March 10, 2012	BOA	*****3801			9,000.00
Monday, March 12, 2012	BOA	*****3801	11:36 AM	Mondawmin	7,800.00
Monday, March 12, 2012	M&T	*****7645		Roland Park	4,600.00
Friday, March 16, 2012	BOA	*****3801			9,000.00
Monday, March 19, 2012	BOA	*****3801			9,600.00
Tuesday, March 20, 2012	BOA	*****3801			2,483.00
Thursday, March 22, 2012	BOA	*****3801			5,500.00
Saturday, March 24, 2012	BOA	*****3801			7,500.00
Monday, March 26, 2012	BOA	*****3801			9,800.00
Tuesday, March 27, 2012	BOA	*****3801			7,530.00
Friday, March 30, 2012	BOA	*****3801			8,300.00
Friday, March 30, 2012	M&T	*****7645			1,000.00
Tuesday, April 03, 2012	BOA	*****3801			9,600.00
Wednesday, April 04, 2012	M&T	*****7645			8,000.00
Wednesday, April 11, 2012	BOA	*****3801			5,000.00
Friday, April 13, 2012	BOA	*****3801			9,500.00
Saturday, April 14, 2012	BOA	*****3801			1,800.00
Friday, April 20, 2012	BOA	*****3801			9,400.00
Saturday, April 21, 2012	BOA	*****3801			9,500.00
Friday, April 27, 2012	BOA	*****3801			6,700.00
Saturday, April 28, 2012	BOA	*****3801			9,000.00
Grand Total					<u>2,017,205.23</u>

31 U.S.C. § 5324(a)(3)

COUNTS TWO - FOUR

(Attempting to cause a financial institution to fail to file)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 10 of Count One of this Indictment are incorporated by reference herein.

The Charge

2. On the following dates, in the District of Maryland, the defendants

AMEFIKA GRAY AND

NETWORK AUTO GROUP, INC.

conducted multiple currency transactions on the same day at the same bank, by making multiple currency deposits into Bank of America Account no. *****3801, each in an amount under \$10,000, for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a) and the regulations prescribed thereunder, and in so doing did cause and attempt to cause a domestic financial institution to fail to file a report required under 31 U.S.C. § 5313(a) and the regulations prescribed thereunder, and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

2	Thursday, July 29, 2010	*****3801	10:50 AM	Tollgate Road	9,500.00	BOA
	Thursday, July 29, 2010	*****3801	1:36 PM	Constant Friendship	8,100.30	BOA
					\$17,600.30	
3	Friday, April 22, 2011	*****3801	11:23 AM	Fruitville Pike, PA	9,500.00	BOA
	Friday, April 22, 2011	*****3801	5:56 PM	Mondawmin Mall	9,000.00	BOA
					\$18,500.00	
4	Friday, April 29, 2011	*****3801	12:07 PM	Mondawmin Mall	4,000.00	BOA
	Friday, April 29, 2011	*****3801	5:37 PM	Reisterstown Road	9,500.00	BOA
					\$13,500.00	

31 U.S.C. § 5324(a)(1)

COUNTS FIVE- TWELVE

(Structuring)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 10 of Count One of this Indictment are incorporated by reference herein.

The Charge

2. On the following dates, in the District of Maryland, the defendants,

AMEFIKA GRAY AND

NETWORK AUTO GROUP, INC.

did knowingly structure currency transactions with domestic financial institutions for the purpose of evading the reporting requirements of section 5313 of Title 31, United States Code, and the regulations promulgated thereunder, by making multiple currency deposits in amounts under \$10,000 at different banks on the same day and at the same bank on consecutive days.

5	Friday, July 30, 2010	*****3801	9,500.00	Bank of America
	Friday, July 30, 2010	*****7645	8,500.00	M&T Bank
			\$18,000.00	
6	Wednesday, June 30, 2010	*****3801	9,800.00	Bank of America
	Thursday, July 1, 2010	*****3801	8,000.00	Bank of America
			\$17,800.00	
7	Wednesday, October 20, 2010	*****3801	6,500.00	Bank of America
	Thursday, October 21, 2010	*****3801	9,700.00	Bank of America
			\$16,200.00	
8	Wednesday, December 22, 2010	*****3801	7,500.00	Bank of America
	Thursday, December 23, 2010	*****3801	9,500.00	Bank of America
			\$17,000.00	
9	Thursday, February 8, 2011	*****3801	9,000.00	Bank of America
	Wednesday, February 9, 2011	*****3801	9,500.00	Bank of America
			\$18,500.00	
10	Thursday, June 23, 2011	*****3801	8,000.00	Bank of America
	Friday, June 24, 2011	*****3801	9,000.00	Bank of America
			\$17,000.00	
11	Tuesday, January 17, 2012	*****3801	\$9,000.00	Bank of America
	Wednesday, January 18, 2012	*****3801	\$5,500.00	Bank of America
			\$14,500.00	
12	Thursday, March 8, 2012	*****3801	\$9,400.00	Bank of America
	Friday, March 9, 2012	*****3801	\$9,000.00	Bank of America
			\$18,400.00	

31 U.S.C. § 5324(a)(3)

Forfeiture

THE GRAND JURY FURTHER FINDS THAT:

1. Upon the conviction of any defendant for any of the offenses alleged in Counts One through Twelve of this Indictment, the following property shall be forfeited to the United States pursuant to Title 31, United States Code, Section 5317(c)(1) and Title 28, United States Code, Section 2461(c): all property, real and personal, involved in the offense, and any property traceable thereto.

2. The property subject to forfeiture includes but is not limited to:

- a. a sum of money in the amount of at least **\$2,017,205.23**
- b. One Mercedes Benz 2009 SL63 AMG
- c. \$47,432.82 seized from account number *****3801 at Bank of America.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

31 U.S.C. § 5317(c)(1); 28 U.S.C. § 2461(c); FED. R. CRIMINAL. P. 32.2(a),

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON OF THE GRAND JURY

DATE: 1-29-13

Rod Rosenstein/ets

Rod Rosenstein
United States Attorney